



MEMO ENDORSED

A handwritten signature in black ink, appearing to read "Valerie Figueredo", written over a horizontal line.

HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 12/30/24

Exhibit B to MLBAM's Objection will be provisionally sealed, but sealing based only on the designation in the protective order is not appropriate. The party interested in permanently sealing Exhibit B is directed to make a showing under Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110 (2d Cir. 2006) by January 27, 2025.

SENT VIA ECF

December 24, 2024

Alan Littmann
312.881.5969

alittmann@goldmanismail.com

Honorable Valerie Figueredo
Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 17A
New York, NY 10007-1312

Re: *Sportvision, Inc. et al. v. MLB Advanced Media, L.P.*, No. 18-cv-03025-PGG-DCF

Dear Judge Figueredo:

Defendant MLB Advanced Media, L.P. ("MLBAM") submits this letter-motion to respectfully request the Court's approval to seal Exhibit B to MLBAM's Objection to Magistrate Judge's Memo Endorsement Order of Plaintiffs' Letter Seeking a Partial Lift of the Stay for the reasons detailed in its contemporaneously-filed declaration. Exhibit B is a true and correct copy of the Export Report of Plaintiffs' Expert Mr. Philip Green, dated March 17, 2023 ("Green Report"). Portions of the Green Report have either been designated or describe in detail materials that have been designated "Confidential," "Highly Confidential – Limited," or "Highly Confidential – Attorneys' Eyes Only" by Plaintiffs pursuant to the Stipulated Amended Confidentiality Agreement and Protective Order (Dkt. No. 222).

For these reasons, MLBAM respectfully requests that the Court grant its letter-motion to seal.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan E. Littmann", written in a cursive style.

Alan Littmann

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